

STATEMENT OF BASIS (AI No. 3492)

for draft Louisiana Pollutant Discharge Elimination System permit No. **LA0045942** to discharge to waters of the State of Louisiana.

THE APPLICANT IS: LBC Baton Rouge, LLC
Sunshine Terminal
11666 Port Road
Seabrook, TX 77586

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Lisa Kemp

DATE PREPARED: January 19, 2010

1. PERMIT STATUS

A. Reason For Permit Action:

Permit reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term

B. LPDES permits –

LPDES permit effective date: April 1, 2005

LPDES permit expiration date: March 31, 2010

LPDES permit modification date: June 1, 2005 to reflect a reduced monitoring frequency for Outfall 002.

LPDES permit modification date: December 1, 2008 to add Outfall 008 for new Tank Farm G.

EPA has not retained enforcement authority.

C. Date Application Received: October 2, 2009; additional information received on February 1, 2010.

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY - petro/chemical bulk liquid storage and transfer

LBC Baton Rouge, LLC Sunshine Terminal is an existing bulk liquid storage terminal engaged in the storage and handling (loading/unloading) of miscellaneous liquid products. The facility is not a manufacturing or production facility. Products stored and handled at the facility include petrochemicals, petroleum/oils, acids, bases, pesticides, and others based on customer demand. The site consists primarily of above ground storage tanks and loading/unloading facilities. Products are transferred in and out of the facility via trucks, railcars, barges, and/or ships. The facility operates two boilers for steam generation but does not have cooling towers. The facility does not own the products that it stores and handles, nor does it own the trucks, railcars, or marine vessels involved in product transportation. Water discharged from the facility includes stormwater, sanitary wastewater, steam condensate, maintenance cleaning/utility water, hydrostatic test water, and boiler blowdown. Stormwater is the largest source of wastewater and is collected in operational and non-operational

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areas of the facility. See Appendix A of the permit for a list of products handled and/or stored at the facility.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II
3. Wastewater Type: III
4. SIC code: 4226

C. LOCATION - 1725 Highway 75, in Sunshine, Iberville Parish
 Latitude 30° 17' 12", Longitude 91° 09' 5"

3. OUTFALL INFORMATION

Outfall 001

Discharge Type: treated stormwater runoff from operational areas (*) and tank farms, steam condensate, fire water from equipment testing, potable water, utility water, boiler blowdown, final rinsewater from tank cleaning, transfer hose/pipe cleaning rinse water, and hydrostatic test water
Treatment: sedimentation, evaporation, and carbon adsorption
Location: at the point of discharge from the Carbon Adsorption Unit prior to combining with other waters
Flow: intermittent
Discharge Route: to the Mississippi River

Outfall 002

Discharge Type: stormwater runoff from areas outside of Tank Farms E and F, the west side of the facility, and associated operational areas (*), steam condensate, fire water from equipment testing, utility water, and previously monitored hydrostatic test water
Treatment: none
Location: at the point of discharge to the ditch, northeast of Tank Farm F prior to combining with other waters
Flow: intermittent
Discharge Route: by ditch to Bayou Paul

Outfall 003

Discharge Type: stormwater from inside of Tank Farms A, B, C, E, and F and associated operational areas (*), stormwater runoff from areas outside of tanks farms A, B, and C, and from the east and south sides of the facility, steam condensate, boiler condensate overflow, fire water from equipment testing, utility water, and previously monitored hydrostatic test water
Treatment: none
Location: at the point of discharge to the ditch, northwest of Tank Farm C, east of Outfall 002 prior to combining with other waters
Flow: intermittent
Discharge Route: by ditch to Bayou Paul

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Outfall 004

Discharge Type: stormwater from inside Tank Farms A, B, C, and G and associated operational areas (*), stormwater runoff from areas outside of Tank Farms A, B, C, G, the rail loading/unloading area, and the east and south sides of the facility, steam condensate, fire water from equipment testing, utility water, and previously monitored hydrostatic test water

Treatment: none

Location: at the point of discharge to the ditch, northeast of Tank Farm C, east of Outfall 006, prior to combining with other waters

Flow: intermittent

Discharge Route: by ditch to Bayou Paul

Outfall 005

Discharge Type: treated sanitary wastewater

Treatment: package treatment plant

Location: at the point of discharge from the sewage treatment plant prior to combining with other waters

Flow: 0.003 MGD

Discharge Route: by ditch to Bayou Paul

Outfall 006

Discharge Type: stormwater from inside Tank Farm D and associated operational areas (*), stormwater runoff from areas outside of Tank Farm D, and the northeast portion of the facility, steam condensate, fire water from equipment testing, utility water, and previously monitored hydrostatic test water

Treatment: none

Location: at the point of discharge to the ditch, southwest of Tank Farm D, east of Outfall 003, prior to combining with other waters

Flow: intermittent

Discharge Route: by ditch to Bayou Paul

Outfall 007

Discharge Type: hydrostatic test water

Treatment: if discharged to 001 - sedimentation, evaporation, and carbon adsorption; if discharged to 002, 003, 004, 006, or 008 - none

Location: at the point of discharge from the tank or piping system being tested prior to combining with other waters

Flow: intermittent

Discharge Route: to the Mississippi River via Outfall 001 or to Bayou Paul via Outfall 002, 003, 004, 006 or 008

Outfall 008

Discharge Type: stormwater from inside Tank Farm G and associated operational areas (*), stormwater runoff from areas outside of Tank Farm G, steam condensate, fire water from equipment testing, utility water, and previously monitored hydrostatic test water

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Treatment: none
 Location: at the point of discharge to the ditch, north of Tank Farm G, east of Outfall 004,
 prior to combining with the other waters
 Flow: intermittent
 Discharge Route: by ditch to Bayou Paul

(*) Operational areas include pump stations, truck, rail, and marine loading/unloading containment, waste storage, etc.

4. RECEIVING WATERS

STREAM - Mississippi River (001 and 007)

BASIN AND SEGMENT - Mississippi River Basin, Segment 070301

DESIGNATED USES -
 a. primary contact recreation
 b. secondary contact recreation
 c. propagation of fish and wildlife
 d. drinking water supply

STREAM - Bayou Paul (002, 003, 004, 005, 006, 007, and 008)

BASIN AND SEGMENT - Lake Pontchartrain Basin, Segment 040201

DESIGNATED USES -
 a. primary contact recreation
 b. secondary contact recreation
 c. propagation of fish and wildlife

5. TMDL STATUS

The discharges from LBC Baton Rouge, LLC, Sunshine Terminal are into the Mississippi River (Outfalls 001 and 007), Subsegment 070301 of the Mississippi River Basin, and Bayou Paul (Outfalls 002, 003, 004, 005, 006, 007, and 008), Subsegment 040201 of the Lake Pontchartrain Basin.

Subsegment 070301 of the Mississippi River Basin. Subsegment 070301 is not listed on LDEQ's Final 2006 303(d) List as impaired, and to date no TMDL's have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

Subsegment 040201, Bayou Manchac - from headwaters to Amite River, is listed on LDEQ's Final 2006 303(d) List as impaired for ammonia, phosphorus, nitrogen, organic enrichment/low DO, pathogen indicators, chlorides, sulfates, and tds. The suspected source for the chlorides, sulfates, and tds impairments is site clearance (land development or redevelopment). To date no TMDLs have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDLs for the Lake Pontchartrain Basin, those suspected causes for impairment which are not directly attributed to the petro/chemical bulk liquid storage and transfer facility point source category have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which

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were not determined to be discharged at a level which would cause, have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated.

Organic enrichment/low DO

Outfalls 002, 003, 004, 005, 006, 007, and 008 have the potential to discharge pollutants associated with the organic enrichment/low DO impairment. The organic enrichment/low DO impairment shall be addressed through the BOD₅ parameter for Outfall 005, and through the TOC parameter for Outfalls 002, 003, 004, 006, 007, and 008. The permit also includes Stormwater Pollution Prevention Plan requirements.

Nutrients

Outfalls 002, 003, 004, 006, 007, and 008 have the potential to discharge pollutants associated with the ammonia, phosphorus, and nitrogen impairments because of the storage of various chemicals, and the potential for leaks and spills during the transfer of the product at the pumps, tanks and pipes. Organic enrichment/low DO, ammonia, phosphorus, and nitrogen impairments shall be addressed through the TOC parameter and Stormwater Pollution Prevention Plan requirements. Furthermore, the discharges from this facility travel a significant distance before reaching the impaired stream.

Outfall 005 has the potential to discharge pollutants associated with the ammonia, phosphorus, and nitrogen, impairments. However, the volume of the discharge is too small to have a significant impact on the receiving stream.

LDEQ's position regarding water quality criteria for nutrients, is that when oxygen-demanding substances are controlled and limited in order to ensure that the dissolved oxygen criterion is supported, nutrients are also controlled and limited. See In The Matter of Sierra Club and Louisiana Environmental Network Request for Nutrient Limits. Docket No. AHD-DR-96001. LDEQ April 29, 1996. LAC 33:IX.2707.D.1.f.iii allows the establishment of effluent limitations based on an indicator parameter for the pollutant of concern. LDEQ's consistent approach to controlling nutrients in similar discharges where the WQMP does not otherwise require specific nutrient limitations is achieved by limiting the discharge of oxygen-demanding substances. Compliance with the BOD₅ and TOC limitations as the indicator parameters will result in the control of nutrients from the discharge sufficient to attain and maintain the applicable water quality standard. Effluent monitoring of the indicator parameter as conducted by the permittee in accordance with the effluent limitations of the permit in addition to LDEQ's ambient water quality monitoring program will allow for further evaluation by the Department to determine the effectiveness of the limitation. The reopener clause located in Part II of the final permit allows the Department to modify or revoke and reissue the permit if the limitations as set on the indicator parameter are shown to no longer attain and maintain applicable water quality standards.

Pathogen indicators

Outfall 005 has the potential to discharge pollutants associated with the pathogen indicators impairment. The pathogen indicators impairment shall be addressed through the fecal coliform parameter.

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6. CHANGES FROM PREVIOUS PERMIT

Outfall 002

All drains from inside the containment areas discharge to Outfall 003. However, stormwater can potentially overflow to Outfall 002 in a very heavy rain. Therefore, effluent limitations and monitoring requirements for the priority pollutants have been established at Outfall 002.

Outfalls 003, 004, 006, and 008

Reporting requirements for TKN, Nitrate-Nitrite, Total Phosphorus, Chlorides, and Sulfates have been removed. The suspected source for chlorides and sulfates impairments is site clearance. Ammonia, phosphorus, and nitrogen impairments shall be addressed through the TOC parameter and Stormwater Pollution Prevention Plan requirements contained in the permit. Furthermore, the discharges from this facility travel a significant distance before reaching the impaired stream.

Outfall 004

The wastewater description has been changed to include stormwater from inside Tank Farm G and associated operational areas at the applicant's request.

Outfall 005

Monthly average effluent limitations for BOD, TSS, and Fecal Coliform and monthly average flow reporting have been established at Outfall 005. Weekly average limitations are now daily maximum limitations. These changes have been made in accordance with current LDEQ guidance for similar discharges.

Part II

Because discharges from this facility flow into a drinking water protection area, language has been added to Part II of the permit requiring the permittee to contact the nearby drinking water treatment facility in the event of any unauthorized discharge into the Mississippi River.

LBC requested clarification of the wording of Part II language to clarify the sampling requirements for Outfalls 001, 003, 004, 006, and 008. No changes were made to the sampling requirements for Outfall 001. However, sampling requirements for Outfall 001 are now stated separately because the monitoring period for Outfall 001 is once per month. The sampling requirements language for Outfalls 003, 004, 006, and 008 has been changed to state that specified parameters must be monitored once per quarter at the outfall (s) that could be affected by handling/storage of commodities containing one or more of the specified chemicals, and once for two monitoring periods thereafter (once per quarter). If the effluent limitation is exceeded during either of these two additional monitoring periods, then monitoring shall continue **once per month** until the limit is met for **two consecutive months**, at which time monitoring for this parameter shall cease. See Part II, Paragraph K of the permit.

7. COMPLIANCE HISTORY/COMMENTS

- A. OEC – There are no records of open, appealed, or pending OEC enforcement actions as of January 13, 2010.

The following leaks and spills in the last three years were noted:

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The following leaks and spills in the last three years were noted:

1. Leak of approximately 15 bbls of Carbon Black Oil on January 7, 2008 due to steam coil failure.
2. Leak of approximately 10 gallons of Vacuum Gas Oil on January 7, 2008, source not identified.
3. Leak of approximately 20 gallons of Caustic Soda on March 30, 2009 due to pinhole leak on piping.
4. Leak of approximately 30 gallons of Benzene on September 22, 2009 due to a leak on a hose. Visible materials and contaminated soil was collected for disposal in accordance with regulation. There is no known off-site impact and no complaints were received by LBC in connection with the release.

- B. DMR Review/Excursions – DMRs were reviewed for the period July, 2007 to September, 2009. The following excursions were reported:

Parameter	Outfall	Monitoring Period End Date	Permit Limits	Reported Value
Fecal Coliform	005	December, 2009	400 col/100ml	TNTC
TSS	005	December, 2009	45 mg/L	63 mg/L
	003, 004, 006, 007, 008	June, 2009		No sample
TSS	007	May, 2008		No TSS sample
TSS	007	April, 2008		No TSS sample

- C. Inspection - There are no recent compliance inspection reports on file.
- D. Permit Actions Taken: The facility was referred to surveillance for a compliance inspection because there are no recent inspections on file. The facility was referred to enforcement for leaks and spills.

8. EXISTING EFFLUENT LIMITS

See Attachment 1.

9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 040201 of the Lake Pontchartrain Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). The receiving waterbody, Subsegment 070301 of the Mississippi River Basin, has been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for the Pallid sturgeon, which is listed as an endangered species. LDEQ has not submitted this draft permit to the FWS for review in accordance with a letter dated January 11, 2010 from Rieck (FWS) to Nolan (LDEQ). As set forth in the Memorandum of Understanding between the LDEQ and the FWS, and based on information provided by the FWS, LDEQ has determined that the issuance of the LPDES permit is not likely to have an adverse effect upon the Pallid sturgeon (070301). The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

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10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

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Rationale for LBC Baton Rouge, LLC

- Outfall 001** - treated stormwater runoff from operational areas (*) and tank farms, steam condensate, fire water from equipment testing, potable water, utility water, boiler blowdown, final rinsewater from tank cleaning, transfer hose/pipe cleaning rinse water, and hydrostatic test water

Outfall 002 – stormwater runoff from areas outside of Tank Farms E and F, the west side of the facility, and associated operational areas (*), steam condensate, fire water from equipment testing, utility water, and previously monitored hydrostatic test water

Outfall 003 - stormwater from inside of Tank Farms A, B, C, E, and F and associated operational areas (*), stormwater runoff from areas outside of tanks farms A, B, and C, and from the east and south sides of the facility, steam condensate, boiler condensate overflow, fire water from equipment testing, utility water, and previously monitored hydrostatic test water

Outfall 004 - stormwater from inside Tank Farms A, B, C, and G and associated operational areas (*), stormwater runoff from areas outside of Tank Farms A, B, C, G, the rail loading/unloading area, and the east and south sides of the facility, steam condensate, fire water from equipment testing, utility water, and previously monitored hydrostatic test water

Outfall 006 - stormwater from inside Tank Farm D and associated operational areas (*), stormwater runoff from areas outside of Tank Farm D, and the northeast portion of the facility, steam condensate, fire water from equipment testing, utility water, and previously monitored hydrostatic test water

Outfall 008 - stormwater from inside Tank Farm G and associated operational areas (*), stormwater runoff from areas outside of Tank Farm G, steam condensate, fire water from equipment testing, utility water, and previously monitored hydrostatic test water

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
Flow-MGD	Report	Report	**; BPJ
TOC	---	50 mg/L	**;BPJ
Oil & Grease	---	15 mg/L	**; BPJ
pH	6.0 su	9.0 su	**; BPJ
METALS, CYANIDE, TOTAL PHENOLS			
Antimony ²	---	600 ug/L	Current permit; BPJ
Arsenic ²	---	100 ug/L	Current permit; BPJ
Beryllium ²	---	100 ug/L	Current permit; BPJ
Cadmium ²	---	100 ug/L	Current permit; BPJ
Chromium ²	---	150 ug/L	Current permit; BPJ
Copper ²	---	500 ug/L	Current permit; BPJ
Lead ²	---	150 ug/L	Current permit; BPJ
Mercury ²	---	10 ug/L	Current permit; BPJ
Nickel ²	---	500 ug/L	Current permit; BPJ
Selenium ²	---	100 ug/L	Current permit; BPJ
Silver ²	---	100 ug/L	Current permit; BPJ
Thallium ²	---	100 ug/L	Current permit; BPJ

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Zinc ²	---	1000 ug/L	Current permit; BPJ
Total Cyanide ²	---	100 ug/L	Current permit; BPJ
Total Phenols ¹	---	500 ug/L	Current permit; BPJ
VOLATILE COMPOUNDS			
Acrolein ²	---	100 ug/L	Current permit; BPJ
Acrylonitrile ²	---	100 ug/L	Current permit; BPJ
Benzene ²	---	100 ug/L	Current permit; BPJ
Bromoform ²	---	100 ug/L	Current permit; BPJ
Carbon Tetrachloride ²	---	100 ug/L	Current permit; BPJ
Chlorobenzene ²	---	100 ug/L	Current permit; BPJ
Chlorodibromomethane ²	---	100 ug/L	Current permit; BPJ
Chloroethane ²	---	100 ug/L	Current permit; BPJ
2-Chloroethyl Vinyl Ether ²	---	100 ug/L	Current permit; BPJ
Chloroform ²	---	100 ug/L	Current permit; BPJ
Dichlorobromomethane ²	---	100 ug/L	Current permit; BPJ
1,2-Dichlorobenzene ²	---	100 ug/L	Current permit; BPJ
1,3-Dichlorobenzene ²	---	100 ug/L	Current permit; BPJ
1,4-Dichlorobenzene ²	---	100 ug/L	Current permit; BPJ
1,1-Dichloroethane ²	---	100 ug/L	Current permit; BPJ
1,2-Dichloroethane ²	---	100 ug/L	Current permit; BPJ
1,1-Dichloroethylene ²	---	100 ug/L	Current permit; BPJ
1,2-Dichloroethylene ²	---	100 ug/L	Current permit; BPJ
1,2-Dichloropropane ²	---	100 ug/L	Current permit; BPJ
1,3-Dichloropropylene ²	---	100 ug/L	Current permit; BPJ
Ethylbenzene ²	---	100 ug/L	Current permit; BPJ
Methyl Bromide ²	---	100 ug/L	Current permit; BPJ
Methyl Chloride ²	---	100 ug/L	Current permit; BPJ
Methylene Chloride ²	---	100 ug/L	Current permit; BPJ
1,1,2,2-Tetra-Chloroethane ²	---	100 ug/L	Current permit; BPJ
Tetrachloroethylene ²	---	100 ug/L	Current permit; BPJ
Toluene ²	---	100 ug/L	Current permit; BPJ
1-2-Trans-Dichloroethylene ²	---	100 ug/L	Current permit; BPJ
1,1,1-Trichloroethane ²	---	100 ug/L	Current permit; BPJ
1,1,2-Trichloroethane ²	---	100 ug/L	Current permit; BPJ
Trichlorethylene ²	---	100 ug/L	Current permit; BPJ
Vinyl Chloride ²	---	100 ug/L	Current permit; BPJ
Total Xylenes ⁴	---	100 ug/L	Current permit; BPJ
ACID COMPOUNDS			
Phenol ²	---	100 ug/L	Current permit; BPJ
2-Nitrophenol ²	---	100 ug/L	Current permit; BPJ
4-Nitrophenol ²	---	100 ug/L	Current permit; BPJ
2,4-Dinitrophenol ²	---	100 ug/L	Current permit; BPJ
4,6-Dinitro-o-Cresol ²	---	100 ug/L	Current permit; BPJ
P-Chloro-M-Cresol ²	---	100 ug/L	Current permit; BPJ

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p-Chlorophenol ²	---	100 ug/L	Current permit; BPJ
Pentachlorophenol ²	---	100 ug/L	Current permit; BPJ
2-chlorophenol ²	---	100 ug/L	Current permit; BPJ
2,4-Dichlorophenol ²	---	100 ug/L	Current permit; BPJ
2,4,6-Trichlorophenol ²	---	100 ug/L	Current permit; BPJ
2,4-Dimethylphenol ²	---	100 ug/L	Current permit; BPJ
BASE/NEUTRAL COMPOUNDS			
1,2-Diphenylhydrazine ²	---	100 ug/L	Current permit; BPJ
1,2,4-Trichlorobenzene ²	---	100 ug/L	Current permit; BPJ
2-Chloronaphthalene ²	---	100 ug/L	Current permit; BPJ
2,4-Dinitrotoluene ²	---	100 ug/L	Current permit; BPJ
2,6-Dinitrotoluene ²	---	100 ug/L	Current permit; BPJ
3,3'-Dichlorobenzidine ²	---	100 ug/L	Current permit; BPJ
3,4-Benzofluoranthene ²	---	100 ug/L	Current permit; BPJ
4-Bromophenyl Phenyl Ether ²	---	100 ug/L	Current permit; BPJ
4-Chlorophenyl Phenyl Ether ²	---	100 ug/L	Current permit; BPJ
Acenaphthene ²	---	100 ug/L	Current permit; BPJ
Acenaphthylene ²	---	100 ug/L	Current permit; BPJ
Anthracene ²	---	100 ug/L	Current permit; BPJ
Benzidine ²	---	100 ug/L	Current permit; BPJ
Benzo (a) Anthracene ²	---	100 ug/L	Current permit; BPJ
Benzo (a) Pyrene ²	---	100 ug/L	Current permit; BPJ
Benzo, (g,h,i) Perylene ²	---	100 ug/L	Current permit; BPJ
Benzo (k) Fluoranthene ²	---	100 ug/L	Current permit; BPJ
Bis (2-Chloroethoxy) Methane ²	---	100 ug/L	Current permit; BPJ
Bis (2-Chloroethyl) Ether ²	---	100 ug/L	Current permit; BPJ
Bis (2-Chloroisopropyl) Ether ²	---	100 ug/L	Current permit; BPJ
Bis (2-Ethylhexyl) Phthalate ²	---	100 ug/L	Current permit; BPJ
Butyl Benzyl Phthalate ²	---	100 ug/L	Current permit; BPJ
Chrysene ²	---	100 ug/L	Current permit; BPJ
Dibenzo (a,h) Anthracene ²	---	100 ug/L	Current permit; BPJ
Diethyl Phthalate ²	---	100 ug/L	Current permit; BPJ
Dimethyl Phthalate ²	---	100 ug/L	Current permit; BPJ
Di-N-Butyl Phthalate ²	---	100 ug/L	Current permit; BPJ
Di-N-Octyl Phthalate ²	---	100 ug/L	Current permit; BPJ
Fluoranthene ²	---	100 ug/L	Current permit; BPJ
Fluorene ²	---	100 ug/L	Current permit; BPJ
Hexachlorobenzene ²	---	100 ug/L	Current permit; BPJ
Hexachlorobutadiene ²	---	100 ug/L	Current permit; BPJ
Hexachlorocyclopentadiene ²	---	100 ug/L	Current permit; BPJ
Hexachloroethane ²	---	100 ug/L	Current permit; BPJ
Ideno (1,2,3-c,d) Pyrene ²	---	100 ug/L	Current permit; BPJ
Isophorone ²	---	100 ug/L	Current permit; BPJ
Naphthalene ²	---	100 ug/L	Current permit; BPJ
Nitrobenzene ²	---	100 ug/L	Current permit; BPJ

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N-Nitrosodimethylamine ²	---	100 ug/L	Current permit; BPJ
N-Nitrosodi-n-propylamine ²	---	100 ug/L	Current permit; BPJ
N-Nitrosodiphenylamine ²	---	100 ug/L	Current permit; BPJ
Phenanthrene ²	---	100 ug/L	Current permit; BPJ
Pyrene ²	---	100 ug/L	Current permit; BPJ
PESTICIDES/HERBICIDES			
Atrazine ²	---	100 ug/L	Current permit; BPJ
Acetochlor ²	---	10 ug/L	Current permit; BPJ
Alpha-Endosulfan ²	---	10 ug/L	Current permit; BPJ
Beta-Endosulfan ²	---	10 ug/L	Current permit; BPJ
Endosulfan Sulfate ²	---	10 ug/L	Current permit; BPJ
Aldrin ²	---	10 ug/L	Current permit; BPJ
Alpha-BHC ²	---	10 ug/L	Current permit; BPJ
Beta-BHC ²	---	10 ug/L	Current permit; BPJ
Gamma-BHC ²	---	10 ug/L	Current permit; BPJ
Delta-BHC ²	---	10 ug/L	Current permit; BPJ
Dieldrin ²	---	10 ug/L	Current permit; BPJ
4,4'-DDE ²	---	10 ug/L	Current permit; BPJ
4,4'-DDD ²	---	10 ug/L	Current permit; BPJ
4,4'-DDT ²	---	10 ug/L	Current permit; BPJ
Heptachlor ²	---	10 ug/L	Current permit; BPJ
Endrin Aldehyde ²	---	10 ug/L	Current permit; BPJ
Heptachlor Epoxide ²	---	10 ug/L	Current permit; BPJ
Chlordane ²	---	10 ug/L	Current permit; BPJ
Toxaphene ²	---	10 ug/L	Current permit; BPJ
PCB-1242 ²	---	3	Current permit; BPJ
PCB-1254 ²	---	3	Current permit; BPJ
PCB-1221 ²	---	3	Current permit; BPJ
PCB-1232 ²	---	3	Current permit; BPJ
PCB-1248 ²	---	3	Current permit; BPJ
PCB-1260 ²	---	3	Current permit; BPJ
PCB-1016 ²	---	3	Current permit; BPJ
2,3,7,8-TCDD (Dioxin) ²	---	5ug/L	Current permit; BPJ
Endrin ²	---	5ug/L	Current permit; BPJ

1. This parameter shall be monitored if the outfall could potentially be affected by the handling and/or storage of commodities containing any phenolic compound.
2. This parameter shall be monitored if the outfall could potentially be affected by the handling and/or storage of commodities containing this parameter.
3. There shall be no discharge of polychlorinated biphenyls (PCBs).
4. This parameter shall be monitored if any commodity that contains xylene compounds has been handled and/or stored at the facility.

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- * Operational areas include pump stations, truck, rail, and marine loading/unloading containment, waste storage, etc.
- ** LDEQ's guidance on stormwater, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (EPA Region 6)

BPJ Best Professional Judgement
 su Standard Units

Treatment: 001 - sedimentation, evaporation, and carbon adsorption; 002, 003, 004, 006, 008 - none

Monitoring Frequency: flow, TOC, oil and grease, and pH shall be monitored monthly for Outfall 001 and once per quarter for Outfalls 002, 003, 004, 006, and 008. Monitoring frequencies are based on the previous permit and on current LDEQ guidance for similar discharges from similar industrial facilities.

Outfall 001

All other parameters must be monitored once during each month in which the outfall could potentially be affected by handling and/or storing commodities containing one or more of the specified chemicals, and once a month for two months thereafter. If the effluent limitation is exceeded during either of these two additional months, then monitoring shall continue once per month until the limit is met for two consecutive months at which time monitoring for the specified parameter shall cease.

Outfalls 002, 003, 004, 006, 008

All other parameters must be monitored once during each quarter in which the outfall could potentially be affected by handling and/or storing commodities containing one or more of the specified chemicals, and once a quarter for two monitoring periods thereafter. If the effluent limitation is exceeded during either of these two additional monitoring periods, then monitoring shall continue **once per month** until the limit is met for **two consecutive months** at which time monitoring for this parameter shall cease.

Only Flow, TOC, oil and grease, and pH shall be monitored at Outfalls 002, 003, 004, 006, and 008 if stormwater from non-diked areas is the only discharge.

Limits Justification: flow, TOC, oil and grease, and pH limits are based on the previous permit and on LDEQ's guidance on stormwater, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (EPA Region 6).

The Total Phenols parameter is included in the permit, based on BPJ and the current permit, because the facility may handle and/or store commodities that contain phenolic compounds, and there is potential for leaks and spills during the transfer of the products. The effluent limit is based on current LDEQ practices.

Total Xylenes, 1,2 Dichloroethylene, Acetochlor, and Atrazine limits are based on the current permit, and by BPJ because of the potential for the facility to handle and/or store commodities containing these chemicals.

All other parameters are included in the permit based on BPJ because of the potential for the facility to handle and/or store commodities containing metals, volatile compounds, acid compounds, base/neutral compounds and pesticides/herbicides, and because there is potential for leaks and spills during the transfer of the products. The effluent limitations are based on state empirical limitations and are consistent with current LDEQ practices for permitting stormwater with potential to discharge these types of pollutants.

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This facility is not subject to Effluent Limitations Guidelines for Transportation Equipment Cleaning, 40 CFR Part 442, because, in accordance with 40 CFR 442.1.a, "this part applies to discharges resulting from cleaning the interior of tanks used to transport chemical, petroleum or food grade cargos" and 40 CFR 442.1.b, "This part is not applicable to... wastewaters resulting from cleaning the interiors of drums, intermediate bulk containers, or closed top hoppers." This facility does not clean tanks used to transport cargo.

2. **Outfall 005 – Treated Sanitary Wastewater (estimated flow is 0.003 MGD)**

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	mg/L		
Flow	Report	Report	LAC 33:IX.2707.1.1 b
BOD ₅	30	45	Similar discharges* (BPJ), LAG530000
TSS	30	45	Similar discharges* (BPJ), LAG530000
Fecal Coliform colonies/100ml	200	400	Similar discharges* (BPJ), LAG530000
pH, s.u.	6.0 (min)	9.0 (max)	Similar discharges* (BPJ), LAG530000

Treatment: package treatment plant

Monitoring Frequency: Semiannually for all parameters at the point of discharge from the STP prior to mixing with other waters.

Limits Justification: Limits and monitoring frequencies are based on current guidance for similar discharges from other industrial facilities and the Class I Sanitary Discharge General Permit, LAG530000 effective December 1, 2007.

* Existing permits for similar outfalls

3. **Outfall 007 – Hydrostatic Test Water**

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	Mg/L		
Flow	Report	Report	LAG670000
Oil & Grease	---	15	LAG670000
TOC	---	50	LAG670000
TSS	---	90	LAG670000
Benzene	---	50 µg/l	LAG670000
Total Lead	---	50 µg/l	LAG670000
BTEX	---	250 µg/l	LAG670000
pH, s.u.	6.0 (min)	9.0 (max)	LAG670000

Treatment: if discharged to 001 - sedimentation, evaporation, and carbon adsorption;
 if discharged to 002, 003, 004, 006, or 008 – none

Monitoring Frequency: 1/discharge from each tank or piping system being tested. Monitoring shall not be required for hydrostatic test water being discharged to Outfall 001 if the test water will be treated via carbon absorption at Outfall 001.

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Limits Justification: Limits and monitoring frequency are based on the Hydrostatic Test General Permit (LAG670000).

* Existing permits for similar outfalls
BPJ Best Professional Judgement
su Standard Units

NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

A SWP3 is included in the permit because there is a potential for storm water contamination from the loading and unloading of chemicals.

For first time permit issuance, the SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. **For renewal permit issuance**, the SWP3 shall be reviewed and updated, if necessary, within six (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility (see Part II, Paragraph M of the Draft Permit).

ADDITIONAL INFORMATION

Notification of Monitoring Frequency Reduction

Please be aware that the Department has the authority to reduce monitoring frequencies when a permittee demonstrates two or more consecutive years of permit compliance. Monitoring frequencies established in LPDES permits are based on a number of factors, including but not limited to, the size of the discharge, the type of wastewater being discharged, the specific operations at the facility, past compliance history, similar facilities and best professional judgment of the reviewer. We encourage and invite each permittee to institute positive measures to ensure continued compliance with the LPDES permit, thereby qualifying for reduced monitoring frequencies upon permit reissuance. If the Department can be of any assistance in this area, please do not hesitate to contact us. As a reminder, the Department will also consider an increase in monitoring frequency upon permit reissuance when the permittee demonstrates continued non-compliance.